

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

JASMINE SALAAM,) CIVIL ACTION NO.: 9:15-cv-04484-DCN-MGB
)
Plaintiff,)
)
-vs-) <u>NOTICE OF REMOVAL TO</u>
) <u>FEDERAL COURT</u>
HAMPTON COUNTY VETERANS)
AFFAIRS OFFICE AND HAMPTON)
COUNTY,)
)
)
Defendant.)

TO: DAVID PROFFITT, ESQUIRE, ATTORNEY FOR PLAINTIFF:

YOU ARE HEREBY NOTIFIED that the Defendant, Hampton County Veterans Affairs Office and Hampton County, by and through its undersigned attorneys, Howell, Gibson and Hughes, P.A., hereby gives Notice of Removal of the above entitled action to the United States District Court, District of South Carolina, Beaufort Division.

The above-entitled action was commenced by service of a Summons and Complaint, on or about October 12, 2015 in the Court of Common Pleas for the County of Hampton [attached hereto as Exhibit A]. That this is a civil action of which this Court has original jurisdiction under the provisions of 28 U.S.C. §1331, and is one which may be removed to this Court by the Defendant herein pursuant to the provisions of 28 U.S.C. §1441, in that this civil action contains a cause of action

upon which the Federal Courts have original jurisdiction. That cause of action is for violation of Title VII, 42 U.S.C. § 2000e-2, et seq. and 42 U.S.C. § 1981a, and it is respectfully submitted that removal to Federal Court is therefore appropriate.

HOWELL, GIBSON & HUGHES, P.A.

By: s/Mary Bass Lohr
Mary Bass Lohr
Post Office Box 40
Beaufort, SC 29901
(843) 522-2400
Federal Bar No: 16927
Attorney for Defendants

Beaufort, South Carolina

November 5, 2015

CERTIFICATE OF SERVICE

I certify that I served the foregoing Notice of Removal upon all counsel of record by affixing same with proper postage placing same with the United States Postal Service addressed to counsels' last known address on the 5th day of November, 2015.

By: s/Mary Bass Lohr
Mary Bass Lohr